

Sent by Email

February 2, 2021

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, ON M4P 1E4

Attention: Christine Long, Registrar

Dear Ms. Long:

**Re: Board File No. EB-2020-0290
Ontario Power Generation 2022-2026 Rate Application**

Willms & Shier Environmental Lawyers LLP is counsel for the Ontario Sustainable Energy Association (“OSEA”).

OSEA is in receipt of Ontario Power Generation’s (“OPG”) application for the above-noted proceeding.

OSEA seeks intervenor status and cost eligibility in this matter.

ABOUT OSEA

OSEA is a not for profit organization that is committed to representing the public interest on energy policy matters that contribute to energy conservation and sustainable energy development for Ontario. OSEA aims to ensure funding and rates that encourage conservation, energy efficiency and the incorporation of renewable energy.

OSEA’s members, both individuals and organizations, are interested in the development of sustainable energy and conservation in Ontario as consumers, individuals and citizens of Ontario. OSEA has been an intervenor and awarded costs by the Board in numerous previous hearings, and the Board recognized that OSEA can provide “an important and unique perspective” in EB 2011-0118.

OSEA actively participates and contributes in Board proceedings and intends to provide meaningful comments on OPG’s rate application.

COST ELIGIBILITY

In accordance with section 3.03 of the Board's *Practice Direction on Cost Awards*, OSEA believes that it is eligible for an award of costs because it:

- a) primarily represents the direct interests of consumers in relation to services that are regulated by the Board, and
- b) primarily represents an interest or policy perspective relevant to the Board's mandate and to this proceeding about OPG's rate application.

OSEA can continue to provide an important and unique perspective in the current consultation initiative. OSEA does not have the funds of its own to allocate towards its meaningful participation in this matter.

OSEA'S REPRESENTATION OF CONSUMERS

In accordance with criterion 3.03(a) from the *Practice Direction*, OSEA primarily represents the direct interests of consumers (eg. ratepayers) in relation to regulated services. OSEA's membership consists of several non-profit and community organizations that advocate for a variety of interest groups including ratepayers. OSEA's members include green technology developers, distributors, installers and operators and other service providers. OSEA thereby represents the direct interests of consumers.

OSEA serves as an advocate, network and capacity builder for individuals, manufacturers, installers, builders, developers, municipalities, First Nations, unions, farmers, co-operatives, NGO's, associations and other organizations supportive of, and engaged in, the full portfolio of sustainability energy solutions. OSEA also aims to provide education about all types of renewable energy technologies.

OSEA is a public interest organization that advocates for energy efficiency, renewable energy and innovation leading to a more sustainable energy economy. OSEA is not an association for energy generators. OSEA's membership is diverse, and includes small scale distributors and service providers of renewables, and very few large generators. OSEA's mandate includes assisting consumers and their communities to receive the best value for their energy dollars whether through conservation, efficiency, generation, or otherwise. OSEA is not a trade or industry association representing any specific product suppliers, generators, or specific generation technologies.

OSEA'S POLICY PERSPECTIVE RELATIVE TO THE BOARD'S MANDATE AND THIS PROCEEDING

The Board's mandate is articulated in the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15 (Schedule B), s. 2, and includes promoting energy conservation and energy efficiency in accordance with the policies of the Government of Ontario.

In accordance with criterion 3.03(b) from the *Practice Direction*, OSEA primarily represents a public interest relevant to the Board's mandate and to this proceeding. As previously stated, OSEA represents the public interest and advocates for methodologies and system planning to achieve energy conservation and energy efficiencies.

OSEA's mandate on energy conservation and sustainable energy relates directly to OPG's rate application. OSEA interests in this proceeding include understanding:

- ♦ how estimations of future Surplus Baseload Generation ("SBG"), both before and after the retirement of Pickering NGS, will impact renewable energy generation and the value of renewable resources for community power projects
- ♦ how OPG plans to operate its hydroelectric fleet in the future, and how OPG's plans could influence the Province's ability to integrate more renewable energy generation
- ♦ OPG's approach to nuclear refurbishment rate smoothing, and how deferring costs for rate smoothing could reduce the incentive for customers to invest in renewable energy generation, and
- ♦ OPG's capital variance account related to nuclear refurbishments, including how recovery of OPG's cost overruns related to the refurbishments affects more modest and incremental investments in alternative energy sources.

OSEA has contributed fully to related proceedings that had implications for renewable energy generation. In particular, OSEA has contributed to the development of DSM policy in Ontario for many years. OSEA was invited to participate on the Advisory Committee for the DSM Guidelines. OSEA also intervened in Union Gas Limited and Enbridge Gas Distribution Inc.'s applications for the 2015-2020 DSM Framework (EB-2015-0029 and EB-2015-0049), and the Board's mid-term review of the 2015-2020 DSM plans (EB-2017-0127 and EB-2017-0128). OSEA provided comments on the Post 2020 DSM Framework (EB-2019-0003), and in the proceeding about Enbridge's 2021 DSM Plan (EB-2019-0271).

OSEA also intervened in Enbridge's application for its RNG Enabling Program and Geothermal Energy Service Program (EB-2017-0319), and is currently intervening in Enbridge's Integrated Resources Planning proceeding (EB-2020-0091).

REPRESENTATIVES

OSEA's counsel in this matter are:

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Yours truly,



Joanna Vince
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*Certified as a Specialist in Environmental Law
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cc: OSEA

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